

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

COMMAND ARMS ACCESSORIES,)	
LLC, and CAA INDUSTRIES, LTD.,)	
)	
Plaintiffs,)	Case No. 1:19-cv-06982-LLS
)	
v.)	
)	
ME TECHNOLOGY INC.,)	
)	
Defendant.)	
)	

DECLARATION OF MICHAEL TIRATURIAN

I, Michael (“Mika”) Tiraturian, declare as follows:

1. Since 2015, I have been the Senior Vice President of ME Technology, Inc. d/b/a/ CAA USA. The information set forth herein is based on my personal knowledge.

2. Moshe Oz states that it is well-known that New York City is the best city in the United States for foreign companies, such as CAA Industries, Ltd. (“CAA Israel”), to conduct business. That is only Mr. Oz’s personal opinion. I have been involved in business in the United States for many years with many foreign companies and investors. While New York City is a wonderful city and has advantages for business, it is by no means “well-known” that it is the best city in the United States for foreign companies to do business.

3. More importantly, to my knowledge, CAA USA never did business in New York City.

4. Additionally, in the time I have been involved with CAA USA and CAA Israel, CAA Israel has not, to my knowledge, conducted any significant business in New York City. Neither company has any employees or operations in New York.

5. Command Arms Accessories, LLC, a non-operating shell company, also does not do business in New York City and, to my knowledge, never has.

6. During the time after CAA USA moved its operations to Florida, Eldad Oz continued to serve as the President of the company (until 2018). During that time, Eldad Oz had an apartment in South Florida paid for by CAA USA.

7. In paragraph 6 of his declaration, Moshe Oz states that he is the “shareholder of the plaintiff in four (4) debt collection cases in Florida against ME Technology and RWC Group, LLC,” and that his brother “Eldad is not involved in these lawsuits in any capacity.” Moshe Oz has mischaracterized those lawsuits. First, they are not simple collection cases unrelated to this case. They are part of the shareholder disputes that include this lawsuit, and are closely related. They are not simple collection suits but involve the method that the owners made their capital investments in the two companies. There will be overlapping issues in those cases and this case, involving the ownership of the companies, and most particularly the ownership and control of CAA USA.

8. In addition, Moshe Oz is not “a shareholder” of the plaintiff in four lawsuits. In two of the four cases, the plaintiff is a limited liability company in which he and his brother Eldad are each 50% owners. In each of those cases, the plaintiff is attempting to collect on a loan allegedly made by Moshe Oz, then assigned to the plaintiff.

9. In addition, Eldad Oz is likely to be called as a witness in deposition and at trial for at least three of the cases. In fact, the only reason that Eldad Oz is not a named plaintiff is that there is an allegation that he made oral assignments of the loans at issue.

10. I do not know why Moshe Oz chose to file lawsuits in Florida, but I know that he has filed four so far and will have to appear for depositions and trial for all four.

11. In their response to the motion to transfer ("Response"), the plaintiffs state that Dan Alexander & Co., an Israeli company, will be a witness in the case. I spoke with Dan Alexander, the principal of the company who resides in Israel, who told me that he is not willing to appear voluntarily as a witness.

12. The Response states that CAA USA was initially owned 100% by Moshe and Eldad Oz. That is not true. From its founding, it was owned 100% by Eldad Oz. Moshe Oz became an owner at the same time that Peter Viskovatykh and I became the majority owners.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 15, 2019.



MICHAEL TIRATURIAN